DAVID HOGBEN 13000 Glen Mill Road Rockville, Maryland 20850 * NO. 31,971 EQUITY

COMPLAINANT

IN THE

VS.

WILLIAM THOMAS SIMS ESTATE c/o RUTH GRAY 175 West All Saints Street Frederick, Maryland 21701

CIRCUIT COURT

AND

PATSEY SIMS, LIFE TENANT

AND

FOR

THE UNKNOWN HEIRS, DEVISEES,
DESCENDANTS, PERSONAL REPRESENTATIVES OR SUCCESSORS IN INTEREST
OF WILLIAM THOMAS SIMS AND PATSEY
SIMS, DECEASED

FREDERICK COUNTY,

AN D

ALL PERSONS HAVING OR CLAIMING
TO HAVE ANY INTEREST IN THAT
PARCEL OF UNIMPROVED REAL ESTATE
LOCATED IN BUCKEYSTOWN ELECTION
DISTRICT, DESCRIBED AS LOT, I ACRE
PARKS MILL ROAD AND ASSESSED UPON
THE TAX RECORDS OF FREDERICK
COUNTY, MARYLAND, TO WILLIAM
THOMAS SIMS ESTATE

MARYLAND

AND

MARTHA ANN BRITTAIN, TREASURER OF FREDERICK COUNTY, MARYLAND

DEFENDANTS

BILL OF COMPLAINT TO FORECLOSE THE EQUITY OF REDEMPTION
TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of David Hogben by Ralph L. Gastley, Jr., his solicitor, respectfully represents unto your Honors:

FIRST: That on the 10th day of November, 1981, Martha Ann Brittain, County Treasurer and Collector of Taxes for Frederick County, sold unto him at public auction for the sum of Seven Hundred Dollars (\$700.00) a parcel of real estate without improvements, which is more particularly described as follows: All that real estate situate, lying and being in Buckeystown Election Distirct, Frederick County, Maryland, being situate off Parks Mill Road and containing 1 acre of land, more or less and being all and the same real